



RMI Company Niles, Ohio 44446 TEL 216-652-9951 TWX 810-436-2600

EPA Region 5 Records Ctr.



322525

May 23, 1974

Reply to:
SODIUM PLANT
P. O. BOX 550
ASHTABULA, OHIO
TEL. 216-997-5141

Mr. Donald Seeds
Ohio Environmental Protection Agency
Division of Authorization and Compliance
2110 East Aurora Road
Twinsburg, Ohio 44087

Dear Mr. Seeds:

We would like to present the following factors relating to facilities at the RMI Sodium Plant which we believe are substantially different from other sodium plants in the country. This information is in accordance with Section 415.182, Title 40, of the Code of Federal Regulations.

First, we would like to point out that there is no such thing as a "typical" sodium plant. Each plant has its own particular characteristics.

The characteristics of the RMI Sodium Plant which we feel are relevant to the permit conditions are as follows:

1. The RMI Sodium Plant receives and treats the waste brine stream from the RMI Metals Reduction Plant, which is currently operating under a Federally issued NPDES Permit.
2. In view of the necessity of treating waste brine from the Metals Reduction Plant, it is necessary to use rock salt for fortifying this brine prior to purification and evaporation. Impurities in the rock salt increase suspended solids loading in the waste streams. This fact was apparently not considered, as indicated by subparagraph 16 of the preliminary statement on Page 9614 of the Federal Register of March 12, 1974.
3. The RMI Sodium Plant is not part of a large, fully integrated chemical complex and therefore cannot consume its waste products as fully as other sodium plants may be able to do.

Mr. Donald Seeds

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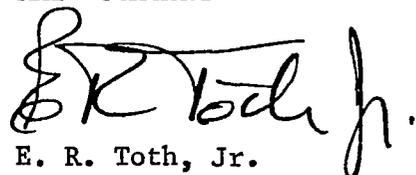
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4. The water supply for this plant is received from Lake Erie, which contains a highly variable amount of suspended solids, much of which is colloidal in nature.

We trust that the above information will be considered during the preparation of the Sodium Plant permit.

Very truly yours,

RMI COMPANY



E. R. Toth, Jr.
General Manager
Ashtabula Plants

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